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**From:** POULSEN Mike [Mike.POULSEN@state.or.us]  
**Sent:** 5/20/2020 3:26:52 PM  
**To:** Allen, Elizabeth [allen.elizabeth@epa.gov]  
**Subject:** RE: Bradford Island  
**Attachments:** Upland OU FS-Responses to Comments-ODEQ-Final-20170714.pdf

Elizabeth —

This is the first document I found, from about three years ago. A quick read indicates that I over-simplified the Corps' position. They apparently call chemicals >1E-6 COCs, but they focus on risk drivers. That is where the disagreement occurs. They are not really planning to remediate to 1E-6. They may end up remediating areas, just not as a CERLA action. If they do not call 1E-6 an ARAR, we lack a mechanism to require action.

Mike

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**From:** POULSEN Mike  
**Sent:** Wednesday, May 20, 2020 8:13 AM  
**To:** 'Allen, Elizabeth' <allen.elizabeth@epa.gov>  
**Subject:** RE: Bradford Island

DEQ has certainly commented on this for the last few years. And attorneys have discussed the matter, with no resolution. I'll see what I can dig up.

Mike

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**From:** Allen, Elizabeth <allen.elizabeth@epa.gov>  
**Sent:** Wednesday, May 20, 2020 8:11 AM  
**To:** POULSEN Mike <Mike.POULSEN@state.or.us>  
**Subject:** RE: Bradford Island

Thank you! Do you have a document that, well, documents that? 😊

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**From:** POULSEN Mike <Mike.POULSEN@state.or.us>  
**Sent:** Wednesday, May 20, 2020 8:05 AM  
**To:** Allen, Elizabeth <allen.elizabeth@epa.gov>  
**Subject:** RE: Bradford Island

Sorry, I was responding to what Oregon does. The Corps is using 1E-4 for Bradford. That is the conflict. We would identify more COCs and areas with unacceptable risk.

Mike

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**From:** Allen, Elizabeth <allen.elizabeth@epa.gov>  
**Sent:** Wednesday, May 20, 2020 8:00 AM  
**To:** POULSEN Mike <Mike.POULSEN@state.or.us>  
**Subject:** RE: Bradford Island

So the Corps is using  $10^{-6}$  as the threshold for COCs, and setting cleanup goals at a  $10^{-6}$  risk per the NCP and OAR? BTW, the Corps does not consider the Oregon rule to be an ARAR.

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**From:** POULSEN Mike <Mike.POULSEN@state.or.us>  
**Sent:** Wednesday, May 20, 2020 7:53 AM  
**To:** Allen, Elizabeth <allen.elizabeth@epa.gov>  
**Subject:** RE: Bradford Island

Elizabeth —

For HH, COCs are those with excess cancer risk  $>1E-6$ , or  $HQ>1$ . A little more complicated if  $HI>1$  because those with  $HQ<1$  can contribute. But I think the main issue is cancer.  $1E-6$  is the answer in Oregon. Not  $1E-5$ , or  $1E-4$ .

Mike

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**From:** Allen, Elizabeth <allen.elizabeth@epa.gov>  
**Sent:** Wednesday, May 20, 2020 7:50 AM  
**To:** POULSEN Mike <Mike.POULSEN@state.or.us>  
**Subject:** RE: Bradford Island

Sorry, I am stuck on another call. Quick question: What is the threshold for selecting COCs for the FS? Is it any chemical for which the risk exceeds  $10^{-6}$ , or  $10^{-4}$ ?

-----Original Message-----

From: POULSEN Mike <Mike.POULSEN@state.or.us>  
Sent: Wednesday, May 20, 2020 7:43 AM  
To: Allen, Elizabeth <allen.elizabeth@epa.gov>  
Subject: RE: Bradford Island

OK, that didn't work. Try calling me at Ex. 6 Personal Privacy (PP) Happy to talk about Bradford.

Mike

-----Original Message-----

From: Allen, Elizabeth <allen.elizabeth@epa.gov>  
Sent: Wednesday, May 20, 2020 7:32 AM  
To: POULSEN Mike <Mike.POULSEN@state.or.us>  
Subject: Bradford Island

Could you give me a call please? We have a call with the Corps this morning, and I have a couple of questions...